

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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AUG 1 1 2010

Ref: 8EPR-N

Mr. Doug Allbright HQ AMC/A7PI 507 Symington Drive Scott Air Force Base, IL 62225

Re: BRAC

BRAC Beddown and Flight Operations of

Remotely Piloted Aircraft at Grand Forks Air Force

Base Final Environmental Impact Statement

Grand Forks County, North Dakota

CEQ # 20100269

Dear Mr. Allbright:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the BRAC Beddown and Flight Operations of Remotely Piloted Aircraft at Grand Forks Air Force Base (GFAFB), North Dakota (ND) Final Environmental Impact Statement (EIS) in accordance with EPA's responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. This EIS was prepared by the U.S. Air Force Headquarters Air Mobility Command in cooperation with the Federal Aviation Administration to evaluate the environmental and social impacts of activities related to the changing mission at the base.

## PROJECT DESCRIPTION

To comply with the 2005 Base Realignment and Closure (BRAC) Commission directive, the Air Force is realigning installations to produce a more efficient and cost effective base structure for achieving national military objectives. At GFAFB, the Air Force was directed to modify infrastructure at the base to accommodate the emerging remotely piloted aircraft (RPA) mission. In support of this effort, the Air Force is proposing to locate RPA at GFAFB and modify the existing airspace structure around GFAFB, in existing Military Operations Areas (MOAs) (i.e., airspace established to separate or segregate certain non-hazardous military activities from other air traffic), and within North Dakota as necessary to perform the proposed RPA operations and training. The current airspace structure around GFAFB does not provide the restricted area (RA) necessary to permit the RPA to operate and train. Two types of RPAs

would be located at GFAFB – eight Global Hawk high altitude aircraft, which are 44 feet long and can achieve speeds up to 450 miles per hour (mph) with a range of over 10,000 miles, and eight Predators, a medium altitude, 27-foot-long aircraft that can fly up to 135 mph with a range of 460 miles. Auxiliary facilities would include four Mission Control Elements and two Launch Recovery Elements for the Global Hawks and one Launch and Recovery Ground Control Station and one Primary Satellite Link for the Predators. The proposed action would include the construction of one new four-bay RPA hanger and nine separate infrastructure projects; the demolition of two existing structures; and the renovation of ten existing structures. The incoming and outgoing missions involve approximately the same number of personnel – about 1,000.

GFAFB is located on 5,222 acres on U.S. Highway 2 in Grand Forks County, ND, near the North Dakota-Minnesota border and 15 miles west of the City of Grand Forks. Two other locations are a part of the RPA mission: (1) Camp Grafton South, in Eddy County near Warwick, ND, and (2) Hector International Airport in Fargo, ND. The RPA will use the 8,862-acre Camp Grafton South site with its 2,600-acre RA for laser target practice. No site work at Camp Grafton South is anticipated other than the installation of warning signs and the temporary placement of placards or former vehicle type targets. At present, there are two Ground Control Stations at Hector International Airport; they will remain with the change of mission. While all RPA launch and recovery operations would be located at GFAFB, once the RPA are airborne, command and control would be transferred to Hector and then transferred back to GFAFB prior to landing. There would be no new construction, demolition, or renovation at Hector.

There are three MOAs within approximately 80 miles of GFAFB that could be used for training. Two of the MOAs – Tiger and Devils Lake – are located to the west and away from Grand Forks International Airport and the third, Beaver, is located to the east of Grand Forks International Airport.

Four action alternatives (i.e., Alternatives A, B, C, and D) that include different combinations of facility and airspace actions and the No Action Alternative were assessed in the Draft EIS. The preferred alternative in the Draft EIS was Alternative A. However, due to further agency and public review and comments, a mitigated Alternative C was determined to be the preferred alternative in the Final EIS to avoid and/or reduce potential impacts to civil aviation. The mitigated Alternative C would only require RAs directly over the GFAFB airfield, a southwest transit area, and a training area in the eastern portion of the Devils Lake MOA.

## **EPA COMMENTS**

As stated in EPA comments on the Draft EIS, because the mission is changing from an air refueling mission to a RPA training mission, the impacts to the environment are anticipated to decrease. In our February 26, 2010 letter, EPA made two recommendations: (1) that the correspondence with the Tribes be summarized and copies of correspondence be placed in the Final EIS, and (2) that other environmental statues, including but not limited to the Endangered Species Act, the Migratory Bird Treaty Act, and the Clean Water Act, be added to the list in Draft EIS section 1.3.2. Additional information was added to the text about coordination with

the Tribes and letters from the two Tribes impacted by the proposed action were placed in Appendix A of the Final EIS. Regarding the second recommendation, although Table 6.2-2: Draft EIS Comment Response Table states that the above statutes were added to the section entitled Additional Environmental Statues and Regulations, they were not.

Thank you for the opportunity to provide comments on the Final EIS for the BRAC Beddown and Flight Operations of Remotely Piloted Aircraft at Grand Forks Air Force Base. If you have any questions or would like to discuss our comments, please contact me at 303-312-6004 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,

Larry Svoboda

Director, NEPA Compliance and Review Program Office of Ecosystems Protection and Remediation